



INTERNATIONAL
PROGRAMS

12 February 2004

Commissioner of Social Security
P.O. Box 17703
Baltimore, MD 21235-7703

RE: Proposed Rule regarding evidence requirements for assignment of Social Security numbers to foreign academic students in F-1 status.

Dear Commissioner:

Indiana University Bloomington enrolls more than 3,000 foreign students and hosts 800 visiting foreign scholars a year. I work in the office that provides services to these individuals, and I have cooperated closely with our local branch of the Social Security Administration to help students and scholars apply for social security numbers. We have had to make many changes to our procedures to meet the demands of new regulations, and we much appreciate the patience and care that the local branch has accorded our students.

I understand and respect the need for caution in issuing social security numbers. Although it has added a delay for many of our students, your use of the SAVE database to confirm immigration status provides an effective safeguard in the application process. And I appreciate very much your recent development of a backup system via a check against the SEVIS database. These measures have significantly reduced the possibility of fraud, and we support them wholeheartedly.

I have very significant reservations, however, about the usefulness of adding an additional check in the form of the requirement of evidence of a job offer before a student can get a social security number. The job offer letter will not improve the quality of positive identification of the applicant, and it is superfluous to the student's authorization to work.

We have always tried to do everything we can to encourage students to comply with laws, and we try to avoid policies and procedures that are so cumbersome that students are tempted simply to avoid them. Many of our departments require the SSN before work is allowed. If a student is able to obtain a social security number at the beginning of his academic career, then when he has the opportunity to work on campus, he can respond quickly. If that student can only get the number after he has had a job offer, then he is faced with finding a way to the social security office (not easy for many students) and waiting for an extended period before he can begin work. The result is that it becomes more tempting to take a job illegally than it does to take one legally.

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The safeguards you have in place do not encourage skirting the rules and do a good job of assuring that the individual has the status he claims to have. The new requirement does not add any additional assurance against fraud , but it adds significant temptation to skirt the rules, and if students do that, they not only work illegally, they become harder to track because you don't have the details that a social security number application gives you the opportunity to collect.

This new requirement goes "a bridge too far." It will compromise our security rather than improve it. I encourage you to abandon this proposal and allow the innovations of the past year to do their good work.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Alan Schoch". The signature is fluid and cursive, with a large, sweeping initial "L".

Lynn Alan Schoch
Senior Associate Director